

CREIZMAN LLC

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 11/14/16

565 Fifth Avenue
7th Floor
New York, New York 10017
tel: (212) 972-0200
fax: (646) 200-5022
ecreiz@creizmanllc.com
www.creizmanllc.com

Via ECF

October 28, 2016

The Honorable Paul G. Gardephe
United States District Judge
United States District Court for the
Southern District of New York
40 Foley Square
New York, New York 10007

MEMO ENDORSED

The Application is granted.

SO ORDERED:

Paul G. Gardephe
Paul G. Gardephe, U.S.D.J.

Dated: *Nov. 10, 2016*

Re: *United States v. Tuzman, 15 Cr. 536 (PGG)*

Dear Judge Gardephe:

We represent Omar Amanat in the above-referenced action. I write to respectfully request a modification of Mr. Amanat's bail conditions. Mr. Amanat's conditions of bail include a \$2.5 million personal recognizance bond, secured by \$250,000 in cash provided by his uncle, who is also one of five co-signers on the bond, strict home detention, with electronic monitoring, and travel restricted to the Southern and Eastern Districts of New York and the District of New Jersey.

Although Mr. Amanat's uncle will remain a co-signer on the bond, he requires the \$250,000 in cash that he contributed to secure the bond. Accordingly, on consent of the government, we have offered to substitute as security for the bond the house owned by his ex-wife, Helena Houdova, in Verona, New Jersey, where she resides with their three young children, including D.A., who was recently injured and underwent brain surgery. We have provided documentation to the government demonstrating that the property is appraised at \$950,000, and that Ms. Houdova has approximately \$400,000 in equity in the house. Accordingly, pledging the house provides additional security.

If the Court grants this motion, we will file the attached confession of judgment with the Superior Court of New Jersey, Essex County, and upon proof of filing, we respectfully request that the Court release the \$250,000 security to either Mr. Amanat's uncle, or to my firm's escrow account for payment to Mr. Amanat's uncle.

Hon. Paul G. Gardephe
October 28, 2016
Page | 2

We thank the Court for its consideration in this matter.

Respectfully Submitted,

/s/ Eric M. Creizman
Eric M. Creizman

cc: AUSAs Andrea Griswold and Damian Williams (by ECF and email)

Attachment